
OAR Box 1192

Prepped by Candice Davis

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THE LOUISIANA LAND AND EXPLORATION COMPANY

909 POYDRAS STREET

P. O. BOX 60350

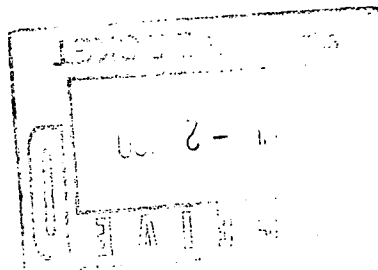
NEW ORLEANS, LA. 70160

(504) 566-6500

JOEL M. WILKINSON
VICE PRESIDENT
PROCESSING AND MARKETING

June 25, 1990

Air Docket (LE-131) of EPA
Room M-1500
401 M Street SW
Washington, DC 20460

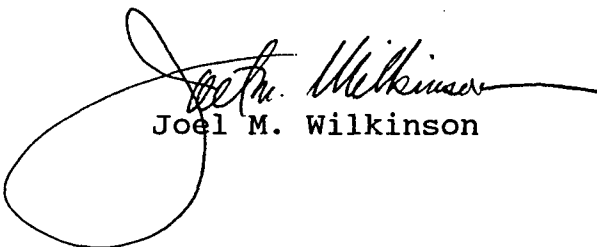


Gentlemen:

I am writing in favor of the waiver requested by Ethyl for using HITEC 3000 in unleaded gasoline. LL&E Petroleum Marketing used the Ethyl MMT additive in leaded gasoline up until July 1989 when we ceased production of leaded gasoline. The MMT provides a small (roughly 0.8) octane number increase when used in our gasoline blends. If the use of MMT were allowed in unleaded blends, it would allow us to reduce the severity of our reformer operations by about one octane number which really means that we reduce overall aromatics in the gasoline. The lower severity also increases the yield of gasoline per barrel of crude charged by a small amount.

Since LL&E Petroleum Marketing is not in a position to verify the environment effects of the engine testing, we request that: if EPA concludes that HITEC 3000 does not increase emission levels, EPA approve HITEC 3000 for unleaded gasoline blending.

Yours very truly,


Joel M. Wilkinson

cc: Mary Smith